

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VASEK POSPISIL, NICHOLAS KYRGIOS,  
ANASTASIA RODIONOVA, NICOLE  
MELICHAR-MARTINEZ, SAISAI ZHENG,  
SORANA CÎRSTEA, JOHN-PATRICK  
SMITH, NOAH RUBIN, ALDILA SUTJIADI,  
VARVARA GRACHEVA, TENNYS  
SANDGREN, and REILLY OPELKA, on  
behalf of themselves and all others similarly  
situated,

-and-

THE PROFESSIONAL TENNIS PLAYERS  
ASSOCIATION,

Plaintiffs,

v.

ATP TOUR, INC., WTA TOUR, INC.,  
INTERNATIONAL TENNIS FEDERATION  
LTD., and INTERNATIONAL TENNIS  
INTEGRITY AGENCY LTD.,

Defendants.

Case No. 1:25-cv-02207-MMG-SDA

**DEFENDANT WTA TOUR, INC.'S  
NOTICE OF MOTION TO COMPEL  
ARBITRATION, MOTION TO DISMISS,  
AND MOTION TO STAY  
PROCEEDINGS**

**ORAL ARGUMENT REQUESTED**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of Lawrence E. Buterman dated May 20, 2025, and upon the exhibits attached thereto, and the accompanying Memorandum of Law, dated May 20, 2025, the undersigned hereby moves this Court on Behalf of Defendant WTA Tour, Inc. (“WTA”) before the Honorable Margaret M. Garnett, in Courtroom 906 of the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, New York, 10007 for an Order granting WTA’s (1) Motion to Compel Arbitration of WTA Player Plaintiffs’ (“WTA Plaintiffs”) claims pursuant to 9 U.S.C. §2,

(2) Motion to Dismiss ATP Player Plaintiffs' ("ATP Plaintiffs") claims pursuant to Federal Rule of civil Procedure 12(b)(6), (3) Motion to Stay Proceedings pursuant to 9 U.S.C. §3, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURHTER NOTICE** that Defendant WTA requests oral argument of the within motion.

Dated: May 20, 2025

Respectfully submitted,

By: /s/ Lawrence E. Buterman  
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